

Case 1:05-cv-00027

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FILED

Clerk

District Court

APR 14 2006

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For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

4 Attorneys for Defendants Justice Alejandro C. Castro,  
5 Justice John A. Manglona, and Timothy H. Bellas

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS

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10 ROBERT D. BRADSHAW, CIVIL ACTION NO. 05-0027

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12 Plaintiff,

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vs.

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15 COMMONWEALTH OF THE  
NORTHERN MARIANA ISLANDS,  
16 NICOLE C. FORELLI, WILLIAM C.  
BUSH, D. DOUGLAS COTTON, L.  
17 DAVID SOSEBEE, ANDREW  
CLAYTON, UNKNOWN AND  
18 UNNAMED PERSONS IN THE CNMI  
OFFICE OF THE ATTORNEY  
19 GENERAL, ALEXANDRO C. CASTRO,  
JOHN A. MANGLONA, TIMOTHY H.  
20 BELLAS, PAMELA BROWN, ROBERT  
BISOM, AND JAY H. SORENSEN,

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Defendants.

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24 **MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT OF EX  
PARTE MOTION EXTENDING TIME  
UNDER LOCAL RULE 7.1.h.3(b) AND  
FEDERAL RULES OF CIVIL  
PROCEDURE 6(b); APPLICATION FOR  
INCREASE OF TIME UNDER LOCAL  
RULE 7.1.h.2**

25 Defendants Alejandro C. Castro, John A. Manglona, and Timothy H. Bellas ("Judicial  
26 Defendants") request that the court allow them additional time, until June 19, 2006, to file a  
dispositive motion or responsive pleading to the Second Amended Complaint filed by the  
Plaintiff in this matter. The Defendants' *ex parte* motion is supported by the Memorandum of  
Points and Authorities which follows, all matters of record herein, and such arguments as may be  
adduced at a hearing hereon.

1 Plaintiff Bradshaw mailed a copy of the Second Amended Complaint to counsel for the  
2 Judicial Defendants at counsel's Saipan Office address. Counsel received the Second Amended  
3 Complaint, sent in the mail to the Saipan Office, on April 13, 2005. The pleading was thereafter  
4 sent by counsel's Saipan Office via overnight mail to Guam, where counsel is presently working,  
5 and was not actually received by counsel until April 14, 2006. Upon review of the Second  
6 Amended Complaint, it appears that the filing deadline for a responsive pleading is April 15,  
7 2006, which falls on a Saturday thus extending the deadline to April 17, 2006. The Second  
8 Amended Complaint is seventy five (75) pages in length and contains numerous attachments.  
9 The Second Amended Complaint alleges a total of seventeen (17) claims.

10 Due to the voluminous nature of the pleadings, and the delayed receipt of the Second  
11 Amended Complaint in the mail, the Judicial Defendants require additional time to properly  
12 review and compose an appropriate response to the pleading.

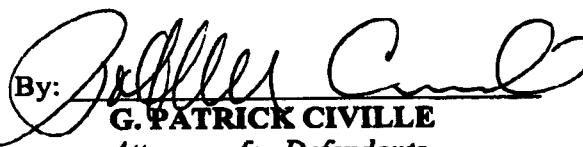
13 For the reasons stated herein, the Judicial Defendants respectfully request that the Court  
14 grant Defendants' *Ex Parte Motion Extending Time Under Local Rule 7.1.h.3(b) and Federal  
15 Rules of Civil Procedure 6(b); Application for Increase of Time Under Local Rule 7.1.h.2.*

16 Respectfully submitted,

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**CIVILLE & TANG**

18 DATED: April 14, 2006

19 By:   
20 **G. PATRICK CIVILLE**  
21 Attorneys for Defendants  
22 Justice Alejandro C. Castro,  
23 Justice John A. Manglona, and  
24 Timothy H. Bellas

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